

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 JIVAN YAKOOB,

Defendant.

Case: 2:07-cr-20084  
Assigned To: Cohn, Avern  
Referral Judge: Majzoub, Mona K  
Filed: 02-22-2007 At 03:43 PM  
INDI USA V. YAKOOB (TAM)

VIOLATION: 18 U.S.C. § 2422(b);  
18 U.S.C. § 2423(b)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

(18 U.S.C. §2422(b) – *Coercion To Commit Illegal Sexual Activity*)

D-1 JIVAN YAKOOB

From on or about October 4 through November 17, 2006, in the Eastern District of Michigan, Southern Division, defendant JIVAN YAKOOB did, by communicating in interstate commerce via computer and the internet, knowingly attempt to persuade, induce, entice and coerce a individual who had not yet attained the age of 18 years to engage in sexual activity for which he could have been charged with a criminal offense, to-wit: Computer contact with a person under 14 for criminal purpose (Criminal Code of Canada, §172.1(1)(c)), all in violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

(18 U.S.C. §2423(b) – *Travel With Intent To Engage In Illicit Sexual Conduct*)

D-1 JIVAN YAKOOB

On or about November 17, 2006, in the Eastern District of Michigan, Southern Division, defendant JIVAN YAKOOB did travel in foreign commerce for the purpose of engaging in illicit sexual conduct with another person, whom he believed to be under 14 years of age and, further, did use a computer to persuade, induce, entice, and coerce the victim to engage in such prohibited conduct, all in violation of Title 18, United States Code, Section 2423(b).

THIS IS A TRUE BILL.

  
s/Grand Jury Foreperson  
FOREPERSON

STEPHEN J. MURPHY  
UNITED STATES ATTORNEY

s/John O'Brien, II  
Assistant United States Attorney  
Deputy Chief, General Crimes Unit

s/JEANINE JONES P55429  
Assistant United States Attorney

Dated:

United States District Court Eastern District of Michigan	<b>Criminal Case C</b>
<p>NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to c</p> <p>Case: 2:07-cr-20084 Assigned To: Cohn, Avem Referral Judge: Majzoub, Mona K Filed: 02-22-2007 At 03:43 PM INDI USA V. YAKOOB (TAM)</p>	
<b>Companion Case Information</b>	
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
Companion Case Number:	
Judge Assigned:	
AUSA's Initials: JMJ	

**Case Title:** USA v. D-1 JIVAN YAKOOB

**County where offense occurred :** Oakland County

**Check One:**       Felony       Misdemeanor       Petty

XX Indictment/ Information --- no prior complaint.

   Indictment/ Information --- based upon prior complaint [Case number: ]

   Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information:

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

February 21, 2007

Date



\_\_\_\_\_  
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